

**LAW OFFICES OF
DONNA R. NEWMAN
ATTORNEY AT LAW
20 VESEY STREET, SUITE 400
NEW YORK, NEW YORK 10007
TEL. 212-229-1516
FAX 212-676-7497
DONNANEWMANLAW@AOL.COM
MEMBER: N.Y. & N.J. BAR**

January 8, 2024

Via ECF and Email

The Honorable Coleen McMahon
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Sabitri Laforest, Garry Laforest, et al*
21 cr 272

Dear Judge McMahon:

I represent Sabitri Laforest in the above-referenced matter. Thomas Dunn, Esq. represents Garry Laforest. Mr. Dunn joins in my application to Your Honor to “So Order” Pretrial Service for the Southern District of New York to release Ms. Laforest and Mr. Laforest’s passport to their son, Chad Laforest. Each these defendants were sentenced by Your Honor on July 13, 2023, and are currently incarcerated serving their sentences.

As a condition of their pretrial release bond each of these defendants gave their passports to pretrial services. Pretrial services informed counsel they are in possession of the Laforests’ passports but require a court order to release the passports. Assistant United States Attorney Matthew Shahabian does not oppose this request. Wherefore, I respectfully request the Court “So Order” Pretrial Services for the Southern District of New York to release the Laforests’ passport to their son, Chad Laforest.

Respectfully submitted,

/s/

Donna R. Newman

Cc: AUSA Matthew Shahabian via ECF & Email

Thomas Dunn, Esq. via ECF & Email

Sabitri Laforest via first class mail